

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

GENERAL MOTORS LLC,

Plaintiff,

v.

THE PARTNERSHIPS and  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE “A,”

Defendants.

Case No. 22-cv-02880

**Judge Martha M. Pacold**

**Magistrate Judge Sheila M. Finnegan**

**DECLARATION OF JAKE M. CHRISTENSEN**

I, Jake M. Christensen, of the City of Chicago, in the State of Illinois, declare as follows:

1. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am one of the attorneys for Plaintiff General Motors LLC (“Plaintiff”). Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify as follows:
2. On June 30, 2022, Plaintiff served its First Set of Interrogatories (“Interrogatories”), First Set of Requests for Admissions (“RFAs”), and First Set of Requests for Production (“RFPs”) (collectively, “Plaintiff’s Discovery Requests”) on Defendants MonsterKing and JFJEWER (“Defendant”).
3. As of September 8, 2022, Defendants have not produced any documents nor served any responses to Plaintiff’s Discovery Requests.
4. On September 1, 2022, Plaintiff sent an email to Defendants requesting a Local Rule 37.2 meet-and-confer conference for that same day, and the parties agreed to speak at 3:30pm

E.S.T. Counsel for Defendants appeared at the meet-and-confer where Plaintiff advised them that the deadline for responding to Plaintiff's Discovery Requests had long since elapsed.

5. **Exhibit 1** attached hereto is an accurate copy of the unpublished decisions cited in the corresponding Plaintiff's Motion for Sanctions Pursuant to Rule 37.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this the 8<sup>th</sup> day of September 2022 at Chicago, Illinois.

/s/ Jake M. Christensen  
Jake M. Christensen  
*Counsel for Plaintiff General Motors LLC*